

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT'S MOTIONS *IN LIMINE***

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of Singular's opposition to the motions *in limine* of defendant, Google LLC ("Google").

2. Attached hereto as Exhibit A is a true and correct copy of an email chain dated December 1, 2010, marked as STX 337 and Bates numbered GOOG-SING-00083457-468.

3. Attached hereto as Exhibit B is a true and correct copy of an email chain dated June 22, 2011, marked as STX 359 and Bates numbered GOOG-SING-00083542-564.

4. Attached hereto as Exhibit C is a true and correct copy of an email chain dated July 13, 2011, marked as STX 378 and Bates numbered GOOG-SING-00083676-77.

5. Attached hereto as Exhibit D is a true and correct copy of an email chain dated February 9, 2021, marked as STX 277 and Bates numbered GOOG-SING-00028357-58.

6. Attached hereto as Exhibit E is a true and correct copy of a document titled "Astro Teller – Google," marked as STX 843 and Bates numbered SINGULAR-00012519-545.

7. Attached hereto as Exhibit F is a true and correct copy of a document titled “Computing 10,000x More Efficiently,” marked as STX 830 and Bates numbered SINGULAR-00004970-984.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the Rebuttal Expert Report of Dr. Khatri, dated March 3, 2023.

9. Attached hereto as Exhibit H is a true and correct copy of a document titled “Multi-Million-Core Processors and their Applications,” marked as STX 833 and Bates numbered SINGULAR-00006847-868.

10. Attached hereto as Exhibit I is a true and correct copy of an email dated January 24, 2014, marked as STX 879 and Bates numbered SINGULAR-00018288-306.

11. Attached hereto as Exhibit J is a true and correct copy of an email chain dated September 11, 2013, marked as STX 582 and Bates numbered GOOG-SING-00242356-362.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from the Opening Expert Report of Dr. Khatri, dated December 22, 2022.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts from the Expert Report of Philip Green, dated December 22, 2022.

14. Attached hereto as Exhibit M is a true and correct copy of an email chain dated September 19, 2013, marked as STX 917 and Bates numbered SINGULAR-00027392-94.

15. Attached hereto as Exhibit N is a true and correct copy of an email chain dated September 24, 2013, marked as STX 404 and Bates numbered GOOG-SING-00113187-88.

16. Attached hereto as Exhibit O is a true and correct copy of excerpts from the deposition of Dr. Jeffrey Dean, taken on July 21, 2021.

17. Attached hereto as Exhibit P is a true and correct copy of an email chain dated January 23, 2014, marked as STX 283 and Bates numbered GOOG-SING-00029813-14.

18. Attached hereto as Exhibit Q is a true and correct copy of excerpts from Google's Sixth Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories (Nos. 1-10), dated July 23, 2021.

19. Attached hereto as Exhibit R is a true and correct copy of excerpts from the deposition of Catherine Tornabene, taken April 29, 2021.

20. Attached hereto as Exhibit S is a true and correct copy of a document titled "SeaStar," marked as STX 323 and Bates numbered GOOG-SING-00073121-138.

21. Attached hereto as Exhibit T is a true and correct copy of a document titled "In-Datcenter Performance Analysis of a Tensor Processing Unit," marked as STX 528 and Bates numbered GOOG-SING-00236774-790.

22. Attached hereto as Exhibit U is a true and correct copy of a document titled "TPU Trajectory – An overview of the major past and potential future product impact of TPUs," marked as STX 555 and Bates numbered GOOG-SING-00240492-515.

23. Attached hereto as Exhibit V is a true and correct copy of a document titled "Google Brain notes 17Sep2013," marked as STX 834 and Bates numbered SINGULAR-00006867.

24. Attached hereto as Exhibit W is a true and correct copy of excerpts from the deposition of Dr. Joseph Bates, taken July 20, 2021.

25. Attached hereto as Exhibit X is a true and correct copy of excerpts from the Expert Report of Laura Stamm, dated March 3, 2023.

26. Attached hereto as Exhibit Y is a true and correct copy of a document titled “The Deep Learning Revolution and Its Implications for Computer Architecture and Chip Design,” marked as Exhibit 6 to the deposition of Dr. Jeffrey Dean (July 21, 2021).

27. Attached hereto as Exhibit Z is a true and correct copy of excerpts from the supplemental deposition of Dr. Jeffrey Dean, taken November 14, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Boston, Massachusetts on December 13, 2023.

/s/ Kevin Gannon